

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

JANE DOE,

Plaintiff,

v.

HILLSTONE RESTAURANT GROUP,
INC. D/B/A R+D KITCHEN,

Defendant.

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C.A. No. 3:20-CV-01151-M

**MOTION TO DISMISS
PLAINTIFF'S MOTION FOR ATTORNEY'S FEES UNDER
28 U.S.C. § 1447(C) AND SANCTIONS UNDER FED R. CIV P. 11 [DOC. 8]**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE LYNN:

Plaintiff Jane Doe files this motion and would show the Court the following:

1. On May 7, 2020, Plaintiff Jane Doe filed suit against Defendant in the District Court of Dallas County, Texas. That same day, Defendant timely removed this case to federal court.

2. On May 8, 2020, Defendant voluntarily sought to remand this matter to Texas state district court. Doc. 5.

3. On May 9, 2020, the Court remanded this matter to Texas state district court without prejudice to Plaintiff filing a motion for attorneys' fees. Doc. 7.

4. On May 14, 2020, Plaintiff filed her motion for attorneys' fees and sanctions. Doc. 8.

**MOTION TO DISMISS PLAINTIFF'S MOTION FOR ATTORNEYS' FEES UNDER 28 U.S.C. § 1447 (C) AND
SANCTIONS UNDER FED. R. CIV. P. 11 [DOC. 8]**

5. Plaintiff no longer wishes to proceed with her claims against Defendant, including seeking attorneys' fees and sanctions in this matter.

6. Accordingly, Plaintiff respectfully requests that the Court enter an order dismissing the attorney fee and sanctions request and closing this matter. Plaintiff submits an agreed order with this filing.

Respectfully submitted,

/s/ Charla G. Aldous
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that the Parties conferred and mutually agree to this relief, so this Motion is being submitted to the Court as Agreed along with an Agreed Order that both Parties have approved for entry.

**CHARLA ALDOUS
BRENT R. WALKER**

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the above and foregoing instrument was served on all the Parties' counsel of record pursuant to the Rules, on the ____ day of _____, 20____, addressed as follows:

Rogge Dunn, Esq.
Gregory M. Clift, Esq.
ROGGE DUNN GROUP, PC
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Suite 1900
Dallas, Texas 75201

- ☐ **VIA ECF / PORTAL**
- ☐ **VIA OVERNIGHT DELIVERY**
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- ☐ **VIA FAX:** (214) 220-3833
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- ☐ **VIA CMRRR:**

**CHARLA ALDOUS
BRENT WALKER**